

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

06 CR 10169 PBS

UNITED STATES OF AMERICA

) CRIMINAL NO.

)
V.

) VIOLATIONS:

PAUL F. MARE,

) 18 U.S.C. § 844(i)

) (Attempted Arson)

Defendant.)

) 18 U.S.C. § 1341

) (Mail Fraud)

) 18 U.S.C. § 844(h)(1)

) (Use of Fire to Commit
a Felony)

INDICTMENT

COUNT ONE: (18 U.S.C. § 844(i) -- Attempted Arson)

The Grand Jury charges that:

On or about May 7, 2005, at Boston, in the District of
Massachusetts,

PAUL F. MARE,

defendant herein, did attempt to damage or destroy, by means of
fire, a building used in interstate or foreign commerce and in
activities affecting interstate or foreign commerce, to wit:

Salon Mare, Inc., a beauty salon, located in a commercial
building at 42 Bromfield Street, Boston, Massachusetts, and its
contents.

All in violation of Title 18, United States Code, Section
844(i).

COUNTS TWO THROUGH FIVE: (18 U.S.C. § 1341 -- Mail Fraud)

Between in or about May, 2005, to in or about January, 2006,
in the District of Massachusetts,

PAUL F. MARE,

defendant herein, did knowingly and willfully devise and execute
a scheme and artifice to defraud and for obtaining money and
property by means of false and fraudulent pretenses,
representations and promises, which scheme and artifice is
further described in the following paragraphs.

General Allegations

1. On or about August 1, 1998, Paul F. Mare ("the defendant") leased commercial space at 42 Bromfield Street, Boston, Massachusetts. The defendant thereafter opened a beauty salon business located at this address, which he owned and operated, called Salon Mare, Inc.

2. On July 29, 2002, the Norfolk & Dedham Mutual Fire Insurance Company of Dedham, Massachusetts, issued an insurance policy, number R0207068, for the defendant's business, Salon Mare, Inc., listing the defendant as the insured. The defendant purchased this policy through an agent, Cooke & Currie Insurance, LTD, of Boston, Massachusetts. The policy, which was for a one-year term, provided coverage of up to \$50,000 for business personal property, \$50,000 fire liability, \$1,000,000 business liability coverage, and 12 months loss of income coverage.

3. On July 29, 2003, the defendant, d/b/a Salon Mare, Inc., renewed the above aforementioned insurance policy, number R0311537, for a one-year term through Cooke & Currie Insurance, LTD.

4. On July 29, 2004, the defendant, d/b/a Salon Mare, Inc., renewed the above aforementioned insurance policy, number R0311537, for another one-year term through Cooke & Currie Insurance, LTD. With inflation adjustment, the business personal property coverage rose to \$53,500.

5. On May 7, 2005, a fire of incendiary origin occurred at Salon Mare, Inc., located at 42 Bromfield Street, Boston, Massachusetts.

6. On or about May 13, 2005, the Norfolk & Dedham Mutual Fire Insurance Company hired T/M Seger Claim Service, Inc., of Duxbury, Massachusetts, as part of the insurance claim process, to investigate and adjust the Salon Mare, Inc., fire.

The Scheme to Defraud

7. It was part of the scheme and artifice to cause or attempt to cause the destruction of the defendant's business, Salon Mare, Inc., by means of fire.

8. It was further part of the scheme and artifice that the defendant would and did cause the submission of a false and fraudulent claim for personal property/business contents loss insurance proceeds to the Norfolk & Dedham Mutual Fire Insurance

Company.

9. On or about the dates listed below, in the District of Massachusetts,

PAUL F. MARE,

defendant herein, for the purpose of executing the aforesaid scheme and artifice to defraud and for obtaining money and property by false and fraudulent pretenses, representations and promises, did cause to be placed in authorized depositories for mail matter, the identified item to be sent and delivered by the United States Postal Service, and did knowingly cause such item to be delivered by the United States Postal Service, according to the directions thereon, as follows:

<u>COUNT</u>	<u>DATE</u>	<u>MAILING</u>
TWO	5/23/05	Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Service, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.
THREE	5/31/05	Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Service, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.

FOUR 6/10/05 Letter relative to the investigation and claim adjustment for the fire at Salon Mare, Inc., on 5/7/05 (Norfolk & Dedham Mutual Fire Insurance Company Policy No. R0311537, Claim No. P0521806), mailed from T/M Seger Claim Services, Inc., to Lorraine A. Peirce, AIC, Senior Property Loss Examiner of the Norfolk & Dedham Mutual Fire Insurance Company at 222 Ames Street, P.O. Box 9109, Dedham, MA.

FIVE 1/13/06 Letter, enclosing an invoice bill and letter, dated 12/29/05, addressed to Salon Mare and Paul Mare from Donna Whitlow, Account Specialist for ServiceMaster By Gilmore Brothers of Framingham, Massachusetts, regarding restoration services rendered at Salon Mare, Inc., following the fire that occurred at that location on May 7, 2005, mailed from Skelly Insurance Agency of Boston, Massachusetts, to Salon Mare, Inc., and Paul Mare, at 42 Bromfield Street, Boston, MA.

All in violation of Title 18, United States Code, Section 1341.

COUNT SIX: (18 U.S.C. § 844(h)(1) -- Use of Fire to Commit a Felony)

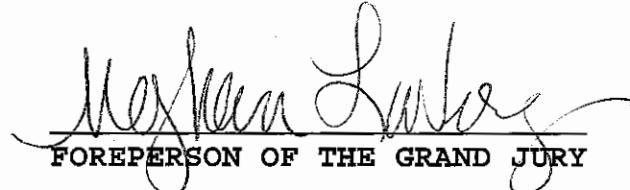
On or about May 7, 2005, at Boston, in the District of Massachusetts,

PAUL F. MARE,

defendant herein, did knowingly use fire to commit a felony prosecutable in a court of the United States, to wit: Mail Fraud, in violation of Title 18, United States Code, Section 1341, as charged in Counts Two through Five of this Indictment.

All in violation of Title 18, United States Code, Section 844(h)(1).

A TRUE BILL



FOREPERSON OF THE GRAND JURY

Antoinette E. Leoney

ANTOINETTE E.M. LEONEY
Assistant United States Attorney

DISTRICT OF MASSACHUSETTS

June 7, 2006

Returned into the District Court by the Grand Jurors and filed.



Deputy Clerk
6/7/06
3:07
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Criminal Case Cover Sheet**06 CR 10169 PBS****U.S. District Court - District of Massachusetts**Place of Offense: _____ Category No. II Investigating Agency ATF _____City Boston _____**Related Case Information:**County Suffolk _____

Superseding Ind./ Inf. _____ Case No. _____

Same Defendant _____ New Defendant _____

Magistrate Judge Case Number _____

Search Warrant Case Number _____

R 20/R 40 from District of _____

Defendant Information:Defendant Name PAUL F. MARE Juvenile Yes No

Alias Name _____

Address 93 East Brookline Street, Apt. #2, Boston, MA 02108Birth date (Year only): 1963 SSN (last 4 #): 9844 Sex M Race: Caucasian Nationality: U.S.Defense Counsel if known: Elliot Weinstein, Esq. Address: 228 Lewis Wharf
Boston, MA 02110

Bar Number: _____

U.S. Attorney Information:AUSA Antoinette E.M. Leoney Bar Number if applicable 545567Interpreter: Yes No List language and/or dialect: _____Victims: Yes No If Yes, are there multiple crime victims under 18 U.S.C. §3771(d)(2) Yes NoMatter to be SEALED: Yes No Warrant Requested Regular Process In Custody**Location Status:**

Arrest Date: _____

 Already in Federal Custody as _____ in _____. Already in State Custody _____ Serving Sentence Awaiting Trial On Pretrial Release: Ordered by _____ on _____Charging Document: Complaint Information IndictmentTotal # of Counts: Petty _____ Misdemeanor _____ Felony _____ 6 _____

Continue on Page 2 for Entry of U.S.C. Citations

 I hereby certify that the case numbers of any prior proceedings before a Magistrate Judge are accurately set forth above.

Date: June 7, 2006

Signature of AUSA: Antoinette E. Leoney

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District Court Case Number (To be filled in by deputy clerk):**Name of Defendant** PAUL F. MARE**U.S.C. Citations**

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ADDITIONAL INFORMATION: